

USALSA Report

United States Army Legal Services Agency

Environmental Law Division Notes

The Environmental Law Division (ELD), United States Army Legal Services Agency, produces the Environmental Law Division Bulletin, which is designed to inform Army environmental law practitioners about current developments in environmental law. The ELD distributes its bulletin electronically in the environmental files area of the Legal Automated Army-Wide Systems Bulletin Board Service. The latest issue, volume 6, number 1, is reproduced in part below.

Lower Courts Taste Bestfoods

In *United States v. Bestfoods*,¹ the Supreme Court addressed whether a parent company can be held liable under the Comprehensive Environmental Response Compensation and Liability Act² (CERCLA) as an operator of clean-up sites that are actually owned by a subsidiary. This note focuses on two lower federal court decisions that recently applied *Bestfoods* to other situations involving derivative liability.

In *Bestfoods*, the Supreme Court examined whether a parent corporation can be held liable as either an owner or operator of a hazardous waste site³ owned by a subsidiary. The court found that CERCLA did not change the general principal of corporate law (that a parent corporation is not liable for the acts of its subsidiaries merely because of the control accorded them through stock ownership or by the duplication of officers.⁴ Rather, the Court found that derivative liability of the parent corporation is possible only if the corporate veil can be pierced under applicable state law.⁵ On the other hand, the parent corporation may be held directly liable for its own actions as an operator of the facility. In this situation, liability is not based on whether the parent operates the subsidiary, but whether it operates the site.⁶ In *Bestfoods*, the Supreme Court remanded the case for the lower court to determine whether the parent corporations acted directly as operators.⁷

In *Browning-Ferris Industries of Illinois, Inc. v. Ter Maat*,⁸ a district court examined whether a corporate officer (Mr. Ter Maat) could be held individually liable under CERCLA. First, the court determined that under *Bestfoods*, the only way Ter Maat could be held directly liable under CERCLA would be derivatively under Illinois corporate veil-piercing law.⁹ The

1. 118 S. Ct. 1876 (1998).

2. 42 U.S.C.A. §§ 9601 – 9675 (West 1998).

3. *Id.* § 9613. Section 9613 of CERCLA provides that contribution may be sought from any person who is liable or potentially liable under CERCLA section 9607. *See id.* §§ 9613, 9607. Section 9607 of CERCLA lists four groups of potentially responsible parties. These are:

(1) the owner and operator of a vessel or a facility,

(2) any person who at the time of disposal of any hazardous substance owned or operated any facility at which such hazardous substances were disposed of,

(3) any person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person, by any other party or entity, at any facility or incineration vessel owned or operated by another party or entity and containing such hazardous substances, and

(4) any person who accepts or accepted any hazardous substances for transport to disposal or treatment facilities, incineration vessels or sites selected by such person . . . shall be liable

Id. § 9607(a)(1)-(4).

4. *Bestfoods*, 118 S. Ct. at 1884.

5. *Id.* at 1885-86.

6. *Id.* at 1186-87.

7. *Id.* at 1890.

8. 13 F. Supp. 2d 756 (W.D. Ill. 1998).

9. *Id.* at 765. Prior to *Bestfoods*, however, the Seventh Circuit held that a corporate officer could be held directly liable as an operator under CERCLA, irrespective of state veil-piercing law. *See* Sidney S. Arst Co. v. Pipefitters Welfare Educ. Fund, 25 F.3d 417, 420-21 (7th Cir. 1994).

court then examined Mr. Ter Maat's behavior under the Illinois veil-piercing factors. Although some of Mr. Ter Maat's actions supported removal of corporate protection, the court found that the plaintiffs did not meet their substantial burden of showing that the corporation was really a dummy or "a sham" protecting a dominating personality.¹⁰ Even though Mr. Ter Maat was president of two insolvent companies, which were operators of the CERCLA site, the court did not hold him personally liable.

Bestfoods also dealt with "operator" liability under CERCLA. Another recent case concerns the derivative liability of entities that "arrange" for the disposal of hazardous waste. In *AT&T Global Information Solutions Co. v. Union Tank Car Co.*,¹¹ the district court considered whether a parent corporation¹² could be held derivatively liable as a CERCLA arranger. Although there was no case law directly on this point, the court found that it was implicit in *Bestfoods* that a parent can be held derivatively liable as an arranger if the corporate veil can be pierced.¹³ The court also found that it is within the intent of CERCLA to impute derivative arranger liability upon a parent corporation if its corporate veil can be pierced and if its subsidiary can be adjudged an arranger.¹⁴ Applying Ohio's corporate veil-piercing law, the court found the parent company's corporate veil should "be pierced to make certain that the entity who ultimately profited from arranging for the improper disposal of hazardous waste bears some of the burden for its cleanup. Any other decision would be circumventing the broad, expansive, and remedial purposes of CERCLA."¹⁵

These cases show that attorneys involved in CERCLA cases should look carefully to see if any solvent parents are lurking behind a dissolved or insolvent "orphan" that is a potentially responsible party under CERCLA. If parents or grandparents are present, attorneys should carefully examine their involve-

ment and observance of corporate formalities. Lieutenant Colonel Howlett.

Ecological Risk Assessments and Natural Resource Injuries

Under CERCLA, response authorities are required to address both adverse human health and environmental effects caused by a hazardous substance release. Response authority under CERCLA was delegated to the Department of Defense (DOD) services.¹⁶ This delegation requires services to assess adverse environmental effects or natural resource injuries (NRIs) during the cleanup process. In 1996, the Army, Navy, and Air Force produced the *DOD Tri-Service Procedural Guidelines for Ecological Risk Assessments*.¹⁷ Because more attention is being focused on how to document adverse environmental effects,¹⁸ this note examines how the services can use ecological risk assessments (ERAs) for this purpose.

Natural Resource Injuries

Natural resource injuries are the adverse environmental effects addressed during remediation by CERCLA remedy. Natural resource injuries refer to a measurable adverse change in the chemical or physical quality or viability of a natural resource caused by the release or the threatened release of a hazardous substance.¹⁹ A primary tool for addressing the NRIs is the ecological risk assessment. Services use the ERA to evaluate the likelihood of ecological problems caused by hazardous substance exposure. The Army generally prepares the ERA during the remedial investigation/feasibility study²⁰ phase of the cleanup process.

10. *Browning-Ferris*, 13 F. Supp. 2d at 765-66.

11. No. C2-94-876, 1998 U.S. Dist. LEXIS 19316, (S.D. Ohio, Nov. 2, 1998).

12. Vermont American, the corporation in question, was actually a "grandparent," since a dissolved subsidiary stood between it and the subsidiary that sent waste to the site.

13. *AT&T Global Information Solutions*, 1998 U.S. Dist. LEXIS at *16 (citing *U.S. v. Northeastern Pharm. & Chem. Co., Inc.*, 810 F.2d 726, 744 (8th Cir. 1986)).

14. *Id.*

15. *Id.* at *39.

16. See 42 U.S.C.A. §§ 9604, 9620; Exec. Order No. 12,580, 52 Fed. Reg. 2923 (1987) (laying out the DOD's authority).

17. See 1 S. RANDALL WENTSEL ET. AL., ARMY, NAVY AND AIR FORCE, *DOD TRI-SERVICE PROCEDURAL GUIDELINES FOR ECOLOGICAL RISK ASSESSMENTS* 1-16 (1996) [hereinafter *TRI-SERVICE ERA GUIDELINES*].

18. For example, the Environmental Protection Agency (EPA) is currently revising its guidelines on ERAs. See *Ecological Risk: EPA Floats First-Ever Draft Ecorisk Management Guidance for Comment*, SUPERFUND REP., Aug. 19, 1998, at 9-15.

19. 43 C.F.R. § 11.14(v) (1997). This does not include the concept of natural resource "damages" which focuses on financial compensation for economic losses. See *id.* § 11.14(l).

20. See generally 40 C.F.R. § 300.430.

ERA Procedure

Ecological risk assessments should tell the reader which environmental problems should be addressed and why. Ecological risk assessments typically begin with *assessment planning* and *problem formulation*, proceeding to the development of *exposure profiles*, a *characterization of ecological effects*, and a *conceptual model*, which provides the basis for *risk communication*. Here is what this jargon means:

Assessment Planning: The primary purpose of the ERA is to translate scientific data into meaningful information about the risk of human activities to the environment.²¹ The risk manager then uses this information to make informed decisions about the environment. Assessment planning is the first step towards “problem formulation.”

Problem Formulation: Problem formulation is meant to articulate the purpose behind an assessment. The ERA focuses on things that people care about, such as habitat, watersheds, or scenic beauty.²² Therefore, ERAs typically examine: (1) ecological susceptibility to known or potential stressors (such as specific contaminants),²³ (2) the ecosystem at risk,²⁴ and (3) the “ecological effects” of exposure.²⁵ After the ERA investigator has sketched out the basic issues, he prepares assessment endpoints,²⁶ which are the environmental values to be protected. Conceptual models²⁷ discuss these endpoints and may focus on the relationships among different species, ecosystem functions, and how multiple pathways may spread a hazardous substance.

Analysis: Problem formulation is followed by the ERA’s “analysis” phase. After evaluating the relevant data, an ERA investigator develops a “characterization of exposure” and a “characterization of ecological effects.”²⁸ The investigator then examines which contaminants are present, from what origin, and at what quantity. Specifically, he looks at how the contaminant moves through the environment. By doing so, he determines how it comes into contact with the species at risk and assesses how long that contact lasts. Often, this means delving into the unknown. For example, many pathways can transport contaminants. Likewise, a researcher may know of the human health effects of a contaminant, but no studies may exist on animals or habitat. Therefore, the ERA must take the existing knowledge of a contaminant’s impacts and project them onto selected species or habitat.²⁹ Adding to the complexity, researchers should also consider latent effects (i.e. impacts over the life cycle process) and the cumulative effects, including breaks in the food cycle. Based on this data and analysis, the ERA investigator may develop an “exposure profile,”³⁰ a “characterization of ecological effects”³¹ and a “conceptual model.”³² These documents show which species are at risk and the circumstances that cause risks to increase or decline. The analysis will also show the ways in which contaminants can cause a chain reaction that affects the target species, related species and their habitat.

Risk Characterization: At this stage, the ERA investigator characterizes the proposed risk to the environment³³ to explain how exposure to a contaminant or related “stressor”³⁴ could affect a species or habitat “receptor.”³⁵ The study tends to focus on vulnerable periods in the lifecycle, such as nesting times, to

21. See TRI-SERVICE ERA GUIDELINES, *supra* note 17, at 6-8 (containing additional information on how the ERA works within the CERCLA context).

22. *Id.* at 28-29.

23. *Id.* at 19-22.

24. *Id.* at 22-23.

25. *Id.* at 23-24.

26. *Id.* at 24-29.

27. *Id.* at 18, 31.

28. *Id.* at 32-47.

29. Adding to the complexity, fact-gathering may involve surrogates. For example, if a rare bird is at risk, a researcher may examine the effect of exposure on a similar bird.

30. TRI-SERVICE ERA GUIDELINES, *supra* note 17, at 46-47.

31. *Id.* at 47-53; *see id.* at 53-77 (discussing specific methods).

32. *Id.* at 90-96; *see id.* at app. A, A1-A43 (containing examples of conceptual models).

33. *See id.* at 53-77 (containing information on how to characterize ecological effects).

34. *See id.* at 19-22 (discussing stressors).

35. *Id.* at 78-101.

determine when a subject is at particular risk. This risk is often projected outward to involve many species (particularly when the food chain is disrupted). Risks may also occur over time. For example, population reductions may occur years after exposure and may affect numerous species. In approaching risk, the ERA writer must “come to grips” with uncertainties at various levels.³⁶ The ERA writer should then add up all of the resulting data, including assumptions and conjectures. The ERA writer will then incorporate appropriate conclusions into an “exposure-response risk model.”³⁷

Risk Communication: Next, the ERA writer compiles assessment results into an “ecological risk summary” for use by the risk manager and other interested parties.³⁸ Risk assessment and risk management are distinct activities. Risk assessments concern a scientific evaluation of whether adverse effects may occur. Risk management involves selecting an action in response to an identified risk.³⁹ Such identified risks may be based on social, legal, political, or economic issues that are outside of the risk assessment’s scope.

Back to Natural Resource Injuries

The ERA’s data may be used to identify NRIs, while providing a baseline for addressing adverse environmental effects during the clean-up. Therefore, at the beginning of the ERA process, the ERA investigator should consider how to define and, possibly, mitigate NRIs. When defining NRIs, DOD service representatives should talk to their respective Army, Navy, and Air Force conservation staffs. In addition, they should also speak with natural resource trustees, land managers, and the public to determine what issues they deem important. In particular, communication with federal, state, and tribal trustees⁴⁰ will help the lead agent meet its CERCLA section 104 requirement to “coordinate” assessments and investigations.⁴¹

To request the *Tri-Service ERA Guidelines* within the DOD, contact the Defense Technical Information Center at (800) 225-3842. Requesters outside of the DOD should contact the National Technical Information Service at <<http://ntis.gov>>. Both should ask for publication #AD A322189. Ms. Barfield.

New DOD Policy for Range Management

Late last year, the Office of the Under Secretary of Defense for Acquisition and Technology requested that a new draft Department of Defense Instruction (DODI) be forwarded for staffing among the DOD services. This proposed DODI⁴² would regulate environmental and explosives safety management of active and inactive ranges that are owned, leased, or operated by the DOD, whether located in the United States or overseas.

The DODI has two purposes: (1) ensuring sustainable use and management of these ranges, and (2) protecting all individuals from explosives hazards on these ranges. The DODI will supersede DODI 6055.14, *Unexploded Ordnance (UXO) Safety on Ranges*, while incorporating its explosives safety management principles. Among the DODI’s draft provisions are specific environmental requirements. As proposed, the services would be required to: (1) assess the environmental impacts of munitions use on ranges, (2) conduct an inventory of their active and inactive ranges, (3) establish range clearance operations to permit sustainable use of their ranges, and (4) incorporate proposed DODI procedures in local management plans.

The services are currently preparing comments to the draft DODI. The final DODI should be effective no later than this summer. Lieutenant Colonel Grant.

Litigation Division Note

Dead Men Tell No Tales, and Neither Do Missing Ones: Finding the Witness

Military attorneys are well aware of the difficulties of locating and contacting witnesses in today’s highly mobile world. Attorneys who are responsible for the initial investigation of a claim or a case must understand what information they must gather when they initially interview the witness. Information they obtain during the initial interview will allow the government to locate the witness years, or even decades later. Attorneys who are responsible for the ultimate litigation of the case must understand the resources available to track down these witnesses using the information gathered earlier. This note outlines these two aspects of locating witnesses, and highlights the

36. The *Tri-Service ERA Guidelines* provide specific ideas on how to deal with uncertainties. See *id.* at 92-96.

37. *Id.* at 85-96.

38. *Id.* at 96-97.

39. *Id.* at 78-80, 100-101.

40. See 42 U.S.C.A. § 9607(f)(2) (West 1998) (defining “public trustees of natural resources”).

41. *Id.* § 9604(b)(2).

42. The proposed policy was originally drafted by the Range Management and Use Subcommittee of the Operational and Environmental Executive Steering Committee for Munitions.

resources, both old-fashioned and on-line, that are available to locate witnesses.

Paragraph 3-9e of *Army Regulation (AR) 27-40*⁴³ requires attorneys to prepare a complete list of witnesses as part of any litigation report. In addition, *AR 27-40* requires that the litigation report contain the name, unit, home address, home and duty phone and social security number (SSN)⁴⁴ of every witness.⁴⁵ Claims offices should develop a form for gathering this information for every witness. If possible, claims attorneys should also elicit whether the witness plans to retire, separate from the service, deploy, or transfer in the foreseeable future. Additionally, claims attorney's should ask the witness whether there is a stable address through which the witness can be contacted in the future (such as, parents, grandparents, home of record). Finally, when interviewing doctors or other professionals, claims attorneys should find out where they are licensed to practice.

Additional complications arise with cases involving Army Reserve or National Guard units. Many of these units are undergoing restructuring and downsizing, much like the Regular Army. In addition to ensuring that they fully detail the above information, claims attorneys should ensure that they have a record of the organizational structure, to include higher headquarters, of the unit involved in the case. This will enable later attorneys involved in the case to locate retired records from these units, should they become deactivated between the incident giving rise to the claim and the litigation. The claims attorney should include the name, address, and phone number of the higher headquarters of the Army Reserve or National Guard unit in question, as well as the names and phone numbers of any permanent staff.

Typically, years will have passed between the initial investigation and the onset of litigation. *All witness information should be updated and verified in the process of preparing the litigation report.* Two primary methods exist to find the witness again: (1) tracking him down through traditional paper-based records, or (2) using the new on-line resources available on the Internet and subscriber services such as Lexis or Westlaw.

Paper-Based Records

Typically, soldiers who depart an installation must complete a clearing process. This process creates a series of records that may potentially give the investigator a forwarding address. Common sense and following the paper trail are necessary ingredients in a successful search.

Unit Records

The attorney, paralegal, or investigator updating the witness information should initially check any and all unit records to determine if they show the current location of the witness. Many units retain copies of transfer and separation orders, and most require their departing soldiers to complete a mail-forwarding card for the unit mailroom. Units that require top secret security clearances often retain copies of Department of Defense Form 398, which provides references and other identifying information on the soldier. Many times checking with a unit will disclose close friends of the witness who are still in touch through electronic mail or Christmas cards.

Post Records

Post records provide other resources to locate the witness. The installation post office may have a forwarding address on the witness and the DEERS coordinator at the local health care facility may have a more current address for the soldier or his family. Additionally, the local military personnel office will have a current alpha roster (as may many staff judge advocate offices), and a current retirement roster. The retirement roster lists a current address on every Army retiree, and is updated on a quarterly basis. Some retiree associations or alumni groups can also prove helpful in locating former soldiers.

Your local post exchange may have a forwarding address for a soldier, particularly if the soldier is enrolled in the deferred payment plan. Local legal assistance client cards can provide current addresses of clients. In addition, you can ask the legal assistance attorney to forward a letter to the client asking for permission to disclose a current address. Transition and separation points also typically maintain information on forwarding addresses of departing soldiers. Other post facilities, such as education centers, may also have records that may prove useful in tracking down a witness.

If you are looking for a health care provider, you should check with the local credentials coordinator at the hospital. Many of these credentials coordinators receive questions from subsequent employers of doctors and nurses who depart the military. Doctors and nurses may spend many years in a particular hospital. Visiting the particular specialty area of the hospital they worked in can often disclose friends who know where they are currently located.

In two separate cases at Litigation Division, one thirty years old and one fifty years old, valuable witnesses were located by talking to one witness and finding others through their Christmas card lists, golf or poker buddies, or general knowledge of

43. U.S. DEP'T OF ARMY, REG. 27-40, LITIGATION, para 3-9(e) (19 Sept. 1994) [hereinafter *AR 27-40*].

44. If no objection.

45. *AR 27-40*, *supra* note 43, para. 3-9(e).

where a friend may have moved after leaving the military. People who serve in the Army often stay in touch with friends. The claims attorney can use these friendships to find witnesses critical for the defense of a case. In the thirty year old case, every obstetrician, nurse, and pediatrician involved in a 1970 birth was identified and located through the use of people's memories and personal contacts, despite records that only listed initials for some individuals. Perseverance, common sense, and creativity often yield results.

Local Records

Local civilian post offices may similarly have records on forwarding addresses of departing soldiers. Many state departments of motor vehicles require addresses to license vehicles or drivers. As a final resort, the Department of the Army can forward a letter to the Internal Revenue Service requesting it to forward the letter to the taxpayer's last address of record.

Electronic Based Records

If you cannot find a witness through a paper-based records search, technology can often assist you in locating him. Be aware that there will be times when you will not be able to locate someone, hopefully that will be the exception not the rule. To succeed in a witness search, you should neither give up hope nor be afraid to open your mind to technology(it can be your biggest ally when you prepare a litigation report.

The Internet

The Internet has become a fast and reliable way to access a myriad of information. The most useful website for finding people is <www.infospace.com>. Once you are on the website, choose the white pages and type in the name of the person whom you need to find. This website's search engine searches by name, and can be narrowed by specifying a location. Notably, however, since this website's information is based on white page telephone book entries, the format of the data will depend on how the person signed up for telephone service, and where the telephone company registers the number. Witnesses with unusual names are easier to find using this website.

The detailed information gathered during the initial witness interviews provides the tools to find the witness later. Multiple searches may be necessary using various search configurations, such as the full name, name and first initial, or using the geographical limitation of state only, or state and city. This website has a very useful tool, which is a reverse lookup function. This enables the user to type in an address and find out the person and telephone number for that address. This is especially useful for soldiers who separate after one tour and move into a home with roommates. The telephone number will not always be listed under the soldier's name, but using the forwarding address the soldier gave while out-processing, you could find

the telephone number for that address. Although the soldier may have already moved out of that location, former roommates can normally give you more information on the witness, such as, where he now lives or where his parents, grandparents, or siblings live.

Other websites that you should be check are <www.lookupusa.com>, (2) <www.switchboard.com>, (3) <www.any-who.com>, and (4) <newstation.com>,(for domestic and international telephone numbers and addresses). Some of these websites require a registration application, which is free and can be filled out on-line the first time you use the site. There is limited use for electronic mail address searches, because most of the information is user-provided and not protected.

When attempting to track down a doctor, the American Medical Association's website, <www.ama-assn.org>, provides valuable information, but can only be searched one state at a time. Once you are on the website, select "Doctor Finder," which allows searches by name or specialty. The website will often give an office address and phone number, which can then be used to reach the doctor. Alternatively, you can use the location disclosed to find the doctor's home address with the previously discussed websites.

Lexis-Nexis

Lexis is very useful when attempting to locate a witness. Your search will be more effective if you have the witness' SSN. Once you are logged onto Lexis, the most useful libraries are FINDER, ASSETS, ALLREC and P-PROP.

In the FINDER library, you should use the files that most appropriately fit your needs. At a minimum, you should search the EZFIND file. EZFIND is a quick way to attempt to locate witnesses who have left the service. Searching by SSN should yield a current address or the most recent address reported by a creditor. To maximize your search effort, try to include all information that you have about the person. Searching by the witness' first and last name will be helpful if it is not a very common name. Using a state of residence will help narrow the possibilities. This could be the last assignment or a home of residence (for example, jones w/3 john and north carolina)

Also in the FINDER library is the M-FIND database. This is the military locator, which includes all branches of the services. This information is helpful, but not always accurate. At a minimum, it will give you a starting point to look for an active duty soldier.

Once you have a current or recent address, you can switch to the ASSETS library and search for the address. The results will allow you to see who owns the property where your witness lives, or when the property was sold.

ALLREC combines the ASSETS library and the P-FIND file and can be searched. P-FIND is a listing from the white

pages of telephone books and does not include unlisted or unpublished numbers. The P-PROP library is one of the most recent additions to LEXIS' libraries. This library allows the searcher to search thirty-three state motor vehicle administrations to obtain licensing information and registration information. This will be a very efficient way to track someone down using his home of record (for example, jones w/3 john and fayetteville).

Westlaw

While the Litigation Division does not use Westlaw as its main legal research program, Westlaw has the same search features that are available on LEXIS. Once you are logged onto Westlaw, you will choose "select a database." The database that will be most effective is the "Public Records" database, which contains nineteen files.⁴⁶ Choose "People Finder," which has an additional ten sub-files. Use the file that will be most effective in your search. You will have to experiment until you develop a feel for what information is contained in each file. Since you will be logging on as a government agency, SSNs are available to you under the "People Finder - Credit Bureau Social Security Number Tracker" file. Follow the prompts in each file to locate your witness. Also available under "Public Records" is the "Asset Locator" file, where you

can search for property records. These property records can help locate a witness by identifying property that he owns or through identifying property owners (like landlords) who may assist you in tracking him down.⁴⁷ Westlaw also has access to motor vehicle records, which is similar to LEXIS. One added feature, however, is that you can search using tag number or vehicle identification number (VIN). Installation Military Police may have a record of the witness' VIN number or tag number through base vehicle registration or traffic infraction files. The "Professional Licenses" file can be used to find doctors or nurses who have left the military.

Conclusion

No matter how you find a witness, as the final step you should call the witness and verify that he is the person you are searching for, and that he is actually at that address and phone number. The defense of the United States in litigation depends on the claims attorney updating the witness list with current addresses and phone numbers. Identifying and contacting witnesses early allows the government to gain valuable momentum in defensive litigation. Major Brenner-Beck, Ms. Williams.

46. The most helpful for the purposes here are: Motor Vehicle Records, People Finder, and Professional Licenses, and Asset locator. Other helpful files are: bankruptcy records, business & corporate filings, census data, county records, CourtLink Dockets, INFOAM (Information America Databases), and Lawsuit Records.

47. Many landlords will have forwarding addresses to send security deposit checks to the tenant-witness.